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**CAMINO BELL**

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12 Attorneys for Defendant  
13 JOHN MUIR HEALTH, ANGELA PERCIVAL and  
SARA MONAHAN

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

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## **STIPULATION**

Pursuant to the Case Management Conference held on September 1, 2016, and the Civil Local Rule 7-12, the Plaintiff Camino Bell and Defendants John Muir Health, Angela Percival, and Sara Monahan (hereafter collectively referred to as “the Parties”), through their attorneys of record, hereby jointly stipulate and request a continuance of the current fact discovery deadline of November 4, 2016 to December 5, 2016, and the current deadline to disclose expert disclosures of December 16, 2016 to January 13, 2017 based on the good cause set forth below.

Plaintiff's Complaint was filed on October 2, 2015 in the above-entitled court. A case management conference was held on September 1, 2016. See Docket #1. The case was referred to Magistrate Judge Joseph C. Spero for settlement purposes. See Docket #27. A Settlement Conference is scheduled for November 3, 2016. See Docket #28. The discovery cut-off deadline in the case is November 4, 2016. See Docket #21. The current deadline to exchange expert disclosures in the case is December 16, 2016. See Docket #21. The trial date for this action is presently set for May 8, 2017. See Docket #21.

The parties believe that a brief continuance of the discovery deadlines will allow the parties to participate meaningfully in settlement negotiations at the upcoming settlement conference scheduled for November 3, 2016, while still allowing time for the parties to complete fact discovery and exchange expert disclosures prior to the proposed deadlines.

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1       Subject to the approval of this Court, the parties have agreed to continue the fact  
2 discovery deadline from November 4, 2016 to December 5, 2016 and the current deadline to  
3 exchange expert disclosures be continued from December 16, 2016 to January 13, 2017. The  
4 parties have also agreed to set a deposition schedule in good faith in the event that mediation is  
5 unsuccessful.

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7 Dated: October 5, 2016

GORDON REES SCULLY MANSUKHANI LLP

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By: /S/ Hieu Tran

MICHAEL D. BRUNO  
HIEU TRAN

Attorneys for Defendants  
JOHN MUIR HEALTH, ANGELA PERCIVAL, SARA  
MONAHAN

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Dated: October 5, 2016

ROSEN SABA LLP

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By: /S/ James R. Rosen

JAMES R. ROSEN  
ELIZABETH L. BRADLEY

Attorneys for Plaintiff  
CAMINO BELL

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**[PROPOSED] ORDER**

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Having considered the Parties' Joint Stipulation to Continue the Fact Discovery Deadline,  
as well as the Court's schedule, the Court hereby continues fact discovery deadline to December

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated: 10/5/16



RICHARD SEEBORG  
United States District Judge